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September 4, 2025

VIA ECF

Hon. Ona T. Wang
U.S. District Judge for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: News Plaintiffs' Motion for Leave to File Overly-Long Letter, *In re OpenAI, Inc.*
Copyright Infringement Litigation, No. 1:25-md-03143 (SHS) (OTW); This Document
Relates To: All Cases

Dear Magistrate Judge Wang:

As OpenAI informed Plaintiffs—both in email correspondence and during a meet and confer just hours before Plaintiffs filed their motion—OpenAI does not oppose Plaintiffs' motion for leave to file a 3,500-word letter so long as OpenAI is afforded the opportunity to file a response of equal length to Plaintiffs' filing. If the Court is inclined to grant Plaintiffs' motion, OpenAI respectfully requests that the Court also grant OpenAI leave to file a 3,500-word response within six business days after the entry of any order granting Plaintiffs' motion.

Sincerely,

KEKER, VAN NEST &
PETERS LLP

LATHAM & WATKINS LLP

MORRISON & FOERSTER
LLP

/s/ Paven Malhotra

/s/ Herman H. Yue

/s/ Rose S. Lee